

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

1:19 CV 00909

Plaintiff,

Loren D. Young

vs.

Defendant(s),

Warden of Cuyahoga County Jail Eric Ivey

Cuyahoga County Sheriff Pinkney

Cuyahoga County Jail director Kenneth Mills

Cuyahoga County Executive Ammond Burdick

(CIVIL CASE NO. _____

(JUDGE _____

(**JUDGE GWIN**

(**MAG. JUDGE BAUGHMAN**

(**FILED**

(**APR 22 2019**

(**CLERK, U.S. DISTRICT COURT**

(**NORTHERN DISTRICT OF OHIO**

(**CLEVELAND**

(**COMPLAINT**

**CIVIL COMPLAINT FOR VIOLATION OF
EIGHTH AMENDMENT RIGHTS**

Pursuant to the 8th Amendment to the U.S Constitution the plaintiff respectfully moves this court to order the defendant(s) to compensate the plaintiff for humiliation, mental anguish, emotional distress, and inhumane treatment of a U.S Citizen in the amount of \$650,000.00 (six hundred and fifty-thousand dollars and zero cents) for the following reasons:

- 1) Plaintiff subjected to inhumane treatment in a County-owned corrections facility
- 2) Defendants neglected to provide a safe and sanitary environment
- 3) Defendant(s) caused the plaintiff to suffer mental and emotional distress

Signature of Plaintiff

Date

Loren D. Young #704182 Lake Erie Correctional Inst.

P.O Box 8000

501 Thompson Rd.

Corneaut, OH. 44030

MEMORANDUM IN SUPPORT

I have not filed another lawsuit against these defendants and I have filed a grievance with the Ohio Supreme Court in regards to these issues. (Forms Attached)

I have attached a statement of proof of commitment.

On June 14, 2019 I, the plaintiff was arrested by the U.S Marshal and the Cleveland Police for a charge of felonious assault and discharging a firearm into a habitat. I remained in the Cuyahoga County Jail until January 15, 2018.

During the time I was confined at the Cuyahoga County Jail I was subjected to very inhumane living conditions which include being forced to eat contaminated food that was served in plastic trays that were cracked and full of stagnant brackish water that smelled like rotten eggs and had black mold encrusted around the food areas that was so thick you could scrape it off with your nail. When I complained about the food trays to the corrections officers I was told to "either eat it or starve." The meals were so miniscule they could not have been enough for an adult daily amount of vitamins.

Most of the time the food would sit in the hallway on a cart uncovered until the officers felt like serving the inmates. Mice and other vermin were running around the edges of the walls in the housing units and in the kitchen area.

I could hear them squeaking in the nighttime when the lights were out.

I was housed in a three-man cell where we were not allowed to eat at the dining tables but had to eat in the room with the toilet. The sink faucet was corroded with green gunk and the toilet was caked with years of grime that would not come off. The sleeping mats were worn out to the point I could feel the steel beneath me and I developed sores on me hips.

On June 17th, 2017 I was so weak and stressed I passed out in the arraignment courtroom and was taken to Lutheran Hospital for emergency care. The Doctor suggested that I follow up with a neurologist within 24 hours due to the head injury but the Sheriff's Deputy took me right back to the County jail and locked me away and took my hospital papers from because he said I couldn't have them in the jail. Since then I have been having medical issues and seizure-like episodes that I do not know the origin of and I am still being denied treatment by a neurologist. I suffer from headaches, blurred vision and dizziness all the time.

I have been diagnosed with PTSD and I am taking medications (Zoloft and Vistaril) to help me with the effects of the mental health issues that have escalated due to the torturous conditions I have had to deal with. I was forced to go six months without a haircut until my defense attorney had to actually order the corrections staff to give me a haircut.

I was denied fresh air and recreation for days at a time due to the red-zone in the jail.(see form I went without showers and cell-cleaning for days at a time due to red-zone.(See form Grievance)

The nature of this suit is 440, Other Civil Rights.


Signature of Plaintiff

4/18/19
Date

STATEMENT OF CLAIM

1)

Warden of Cuyahoga County Jail- Eric Ivey, failed to provide adequate housing units and sanitary conditions for the plaintiff and ignored the many complaints of the plaintiff sent by inmate request forms that were never answered. He ordered the staff to take the blankets away in the winter months when the temperature dropped below freezing (ice formed on the windows) and he refused to turn on the heat in the housing units on the tenth floor, Pod G of the Cuyahoga County Jail.

2)

Sheriff Pinkney was responsible for ensuring that the warden did his job correctly but he did not. Contrary to the many complaints, he also ignored or just didn't follow through.

3)

Cuyahoga County Jail Director Kenneth Mills also neglected to provide the inmates with safe and sanitary conditions by enforcing the rules and allowing the inmates to have access to the new items that were sitting in a storage closet. He failed to provide new blankets and clean food.

4)

Executive Amrod Budish failed to perform his duties as the executive over all the other defendant mentioned in this claim.

I declare under penalty of perjury that the foregoing is true and correct.

[Signature]
Signature

4/12/19
Date

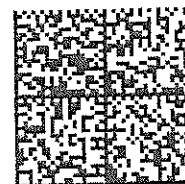
Signed this 12th day of April, 2019 before a Notary Public of Ohio.

[Signature]
Notary Public of Ohio



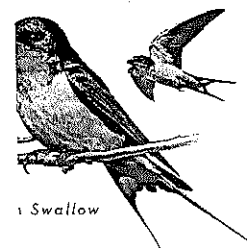
DIANE OLEKSHUK
Notary Public, State of Ohio
Recorded in Ashtabula County
My Commission Expires
February 6, 2024

Loren D. Younger 704182
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Cleveland, OH. 44030



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United States District Court (Northern District)
801 W. Superior Ave. Cleveland, OH. 44113

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